



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

FEB 25 2015

Ref: R8 EPR-N

Kevin Khung, District Ranger
P.O. Box 310
180 Pagosa Street
Pagosa Springs, CO 81147

Re: Draft Environmental Impact Statement for Chimney Rock National Monument,
CEQ #20150005

Dear Mr. Khung:

The U.S. Environmental Protection Agency Region 8 has reviewed the Draft Environmental Impact Statement (EIS) for the Chimney Rock National Monument Management Plan (CRNMMP), developed by the Pagosa Ranger District of the San Juan National Forest (SJNF). The SJNF is analyzing management options to satisfy requirements of the September 21, 2012 Presidential Proclamation No. 8868 (the Proclamation) that established Chimney Rock National Monument (the Monument), to increase the Monument's capacity for visitors and to implement specific prohibitions for the protection of resources and objects at the Monument. Consistent with our authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the EPA has reviewed and rated this Draft EIS.

The planning area consists of the 4,726-acre Monument in the south-central portion of the SJNF. The Monument is managed as two distinct areas, Chimney Rock and Peterson Ridge. The Monument is currently being managed under the Proclamation and the 2013 SJNF and Tres Rios Field Office Land and Resource Management Plan (LRMP). The CRNMMP, if adopted, supersedes the management direction established by the 2013 LRMP for the Monument. The Draft EIS evaluates a No Action Alternative (A) and two action alternatives (B and C), including a proposed alternative (B). It does not identify a preferred alternative. Alternative A does not incorporate specific standards and guidelines to protect cultural and natural Monument resources that will be incorporated into Alternatives B and C through CRNMMP implementation (p. 29). Both Alternatives B and C plan to expand day use visitor facilities (new parking, buildings, shelter, trail) and increase the operating season. Alternative B prohibits current grazing and dispersed camping uses. Alternative C retains those current uses while expanding visitor and interpretive services beyond Alternative B by proposing larger buildings and parking lots, and a longer trail system and operating season.

Minerals Development. The potential for minerals development to occur appears the same across alternatives: the existing lease and reserved and private rights can be developed, but federal rights (other than the existing lease) cannot be (p. 59). The standards and direction intended to be applicable to development under the alternatives vary (p. 61). To date, no development of the existing lease has occurred. In Alternatives B and C, development of the existing lease would be subject to the requirements of the 2013 LRMP, the Proclamation, and the CRNMMP (p. 61). Under all alternatives,

additional site-specific NEPA analysis would be completed (pp. 3, 24, 97). The EPA supports SJNF's intent to develop additional site-specific NEPA and conditions of approval to identify and minimize impacts from minerals development should it occur (p. 24).

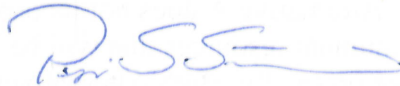
The Draft EIS indicates that development of the existing lease under Alternative A (No Action) does not entail application of the standards and guidelines found in the CRNMMP because management would continue under the 2013 LRMP (p. 61). The 2013 LRMP is oriented at keeping mineral development impacts to a "reasonable" level versus the minimal level to maximize protection of natural and cultural objects as described in the CRNMMP. If the SJNF selects Alternative A, the EPA recommends the SJNF utilize the substantive direction, standards and guidelines described in the CRNMMP (p. 16) in its site-specific NEPA evaluation to develop conditions of approval consistent with the Proclamation's objectives for the Monument "not to create any impacts that would interfere with the proper care and management of the objects protected by this proclamation."

Cultural Resources. The Draft EIS indicates that Alternative C has the greatest potential direct, indirect and cumulative impact to cultural resources because it includes the greatest amount of construction and number of uses (pp. 30, 32). While the CRNMMP monitoring standards will drive adaptive management to protect cultural resources under both Alternatives B and C (p. 29), the EPA is concerned about the amount of potential impact Alternative C represents.

Based on our review, and in accordance with our rating criteria, EPA has rated Alternative B as "Lack of Objections" ("LO") and Alternative C as "Environmental Concerns -1" ("EC-1"). The LO rating signifies that the EPA's review has not identified any potential environmental impacts requiring substantive changes. The basis for the EC rating is that the EPA identified impacts that should be avoided or reduced. The "1" rating signifies that the Draft EIS adequately sets forth the environmental impacts of the alternatives. Regarding Alternative C, the potential cumulative impact of new, increased visitor facilities with the current grazing and dispersed camping represents potential impacts beyond the Monument's current condition. A description of the EPA's rating system can be found at: <http://www.epa.gov/compliance/nepa/comments/ratings.html>.

The EPA appreciates the opportunity to participate in the review of this project. If we may provide further explanation of our comments during this stage of your planning process, please contact me at 303-312-6704, or Maggie Pierce, Lead NEPA Reviewer, at 303-312-6550.

Sincerely,

A handwritten signature in blue ink, appearing to read "P. S. Strobel", with a stylized flourish at the end.

Philip S. Strobel, Acting Director
NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation